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Federal Communications Commission
Washington, D.C. 20554

AUG 30 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Numbering Resource Optimization

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CC Docket No. 99-200
RM No. 9258
NSD File No. L-99-17
NSD File No. L-99-36
NSD File No. L-99-51

REPLY COMMENTS OF TELCORDIA TECHNOLOGIES, INC.

Telcordia Technologies, Inc., formerly Bellcore, submits this Reply for the limited purpose of contributing to the completeness of the technical discussion about number conservation and NANP extension addressed in the Comment cycle in the above-captioned proceeding. Specifically, Cox Communications, Inc. (Cox) suggests that modifications to the Business Rating Input Database System (BRIDS), would permit individual telephone numbers to be associated with specific locations, thus extending the life of the North American Numbering Plan (NANP) (Cox Comments, p. 4-7.)

Telcordia, as the industry provider of the Traffic Routing Administration (TRA) database containing BRIDS, has exhaustive technical working knowledge about BRIDS, and submits this pleading to clarify the use of BRIDS to extend the life of the NANP, and to explain some underlying historical technical details mentioned by Cox. Finally, in lieu of solely modifying BRIDS, Telcordia suggests below that while the technical concept of separating call routing from call rating may provide a means of extending the life of the NANP, number portability outside the rate center, or location portability is the technically feasible method to achieve that goal; and while modifications to BRIDS may be required for this solution, those modifications are far from the only necessary modifications. The FCC and the industry can

determine if this technically feasible solution is the most appropriate number resource optimization method.

In its Comments, Cox correctly explains that BRIDS is the system used by telephone carriers to rate calls from one point to another. BRIDS associates a unique rating point, designated by V (vertical) and H (horizontal) coordinates, with each NPA-NXX. By its nature, the system requires assignment of an NXX to a single rating point within an area code. Thus, if a carrier wants to serve an entire area code, such as the 732 area code in New Jersey, the carrier must obtain an NXX code for each of the multiple rating points in that area code. Cox suggests that there is no requirement that the BRIDS database be limited to the six-digit NPA-NXX combination. It suggests that BRIDS could include all ten digits of the telephone number, thus allowing a specific telephone number to be assigned to any of the rating points within an area code served by the switch, and enabling all calls to that number to be rated properly as local or long distance calls. Cox goes on to claim that "the costs of modifying BRIDS to permit 10-digit designation of rating points are insignificant --- and would cost a total of \$250,000." (Cox, p. 5) Cox's points about the NXX assignment process are correct. However, Cox's position ignores certain technical imperatives and understates the costs. Set forth below, Telcordia explains the history behind the California task force BRIDS modification estimate, and associated technical realities.

In 1996, Telcordia, responded to an April 11, "Request to Bellcore for Rough Order of Magnitude" generated by a workshop established by the California Public Utilities Commission (CPUC), CPUC D. 96-03-020. The question concerned modification to the Terminating Point Master (TPM) to allow accurate rating when an NXX code is used across multiple Rate Centers. Our response specifically addressed a proposal by Teleport Communication Group, Inc. (TCG) regarding modifying the TPM and its underlying database BRIDS. The proposal would have

continued the practice of allocating an entire NXX to a given company, but the company would then be permitted to associate that NXX, a thousands block at a time, to different Rate Centers. Contrary to Cox's Comments in the instant proceeding, this is a significant difference from the line level assignment across Rate Center boundaries. The considerations that must be assessed vary significantly between the two concepts.

Telcordia's response to the workshop also noted an initial "rough" estimate of six months development work at approximately a \$125,000 cost at that time to update BRIDS and the TPM for the above application. That estimate covered modification in the current reporting role and not in any other possible role(s) which may be either real-time service order or call processing driven. A revised figure of \$250,000 may have been discussed at the workshop itself. Given that BRIDS/TPM is basically a report process, the response also emphasized that substantial network and billing impacts (outside BRIDS/TPM) had to also be addressed should the proposal be pursued. Time and cost estimates for these other areas were not addressed in the Telcordia response. No formal proposal was ever submitted.

By placing too much reliance on this historical information, Cox's present-day approach overlooks certain technical characteristics of the switch. Although the BRIDS report can be updated to reflect number assignment in multiple rate centers, the Cox approach doesn't address the fact that the switch is tasked with fulfilling regulatory mandates for carrier selection in addition to routing on the basis of the numbering plan. The key here is both call typing and the associated carrier selection, i.e., local vs. intraLATA toll vs. interLATA toll. For this aspect of call processing, the switch needs unambiguous geographic designations for telephone numbers. Currently, regulatory mandates require the switch to reflect customer choice of carrier on a call-by-call basis: The switch analyzes the NPA-NXX of the dialed digits and then determines on this basis which carrier the call should be routed through.

Modifications to BRIDS to ten digits, without the switch having access to the information for real-time call processing and carrier selection, will result in the switch selecting the carrier on the basis of the dialed NPA-NXX and its associated rate center in the switch call processing logic. Consequently switch call processing logic must be reconciled with BRIDS for the Cox approach to work. Otherwise, Telcordia believes that expanding the database to the ten-digit code, as suggested by Cox, will negate the switch's ability to implement the regulatory mandate for presubscribed carrier selection. The costs associated with the necessary changes to switch, database, and operations systems to accomplish this reconciliation could be significant.


In paragraph 119 of the Commission's NPRM, the Commission raised the question of whether... *"there are ways to separate the call rating functions from the call routing functions, which would result in a reduced demand for NXX codes."* Telcordia Technologies has studied the concept of separating call rating from call routing and published an approach in GR-2982-CORE *Local Number Portability (LNP) Capability Specification: Location Portability* (Issue 1, December 1997). This document provides detailed switching and signaling requirements for separating a geographic identifier from the telephone number itself and from the Location Routing Number (LRN), which identifies the serving switch. **This approach maintains the current regulatory requirements for call typing and carrier selection.** The capability builds on existing LNP technology; the geographic identifier would be associated with the telephone number in the LNP databases, obtained via the LNP query during call processing, and signaled in the SS7 network (ISUP). The capability would involve changes to the LNP databases, switches, billing systems, and to BRIDS. The telephone number would no longer be restricted to a geographic area, i.e., the area of portability would be as large as agreed upon in the regulatory jurisdiction. The key aspect of this approach is that it provides for flexibility for number assignment outside the current rate center while at the same time allowing carriers to use new

forms of distance-sensitive rating, or, if desired, maintain the existing call typing designations of local, intraLATA toll, and interLATA toll. No other approach of which Telcordia is aware allows this type of flexibility in separating the rating and routing functions. Telcordia acknowledges that this solution in essence is location portability, and there are very significant costs to service providers for implementation. Telcordia takes no position on what action the Commission should take with regard to location portability or separation of the rating and routing functions. It simply wishes to provide the Commission with technically accurate information with regard to technically feasible solutions.

Telcordia is available to respond to additional technical questions about the matters raised herein at the request of the Commission.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Angela Patterson, hereby certify that on this 30th day of August, 1999, copies of the foregoing Reply Comments of Telcordia Technologies, Inc. in CC Docket 99-200, were served, via first-class, U.S. mail or hand delivered to the individuals listed on Attachment A.

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